

May 15, 2007

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Superintendent Jim LaRock
Pipestone National Monument
36 Reservation Avenue
Pipestone, Minnesota 56164-1269

Re: Comments on the Draft Environmental Impact Statement for the Pipestone National Monument General Management Plan, Pipestone County, Minnesota, CEQ No. 20070091

Dear Mr. LaRock:

In accordance with United States Environmental Protection Agency (US EPA) responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) for the Pipestone National Monument (PNM) General Management Plan.

The National Park Service is developing a General Management Plan to guide future decisions regarding this unique Minnesota resource. Catlinite is the stone quarried by American Indians from prehistoric times at this site, apparently one of only a few in the country, for the making of ceremonial pipes. This, along with several related landforms, have made the park area a sacred site for multiple tribes who still come to practice various traditions and rights. In 1937, a comparatively small National Monument was created to protect this cultural resource. A now historic, but functionally inadequate structure, was built as a visitor's center in the middle of the landform. A nearby Pipestone Indian School building is a registered National Historic Landmark, and has directly related significance to the PNM, but is presently not part of PNM. Global, national and state threatened and endangered species are located within PNM, contributing to its unique prairie landscapes and the historic Nicollet Expedition biology site. Neighboring developments and land uses threaten the PNM's sacred integrity, functions, and environmental resources. Past decisions, limited resources and philosophically divergent planning goals at national, state and local levels continue to threaten the maintenance and functionality of the monument's most significant resources.

US EPA has not participated in any earlier scoping initiatives for this project, which began in 2000. Local and Indian Tribe stakeholders have been actively pursued to obtain their participation in the scoping process. A list of Park Service and stakeholder concerns was developed and potential actions for addressing them were formulated. These were developed into two alternative plans for long range management of the park. A stakeholders meeting was

then held to negotiate a third compromise plan. Alternatives presented in this DEIS include a no-action "baseline," two diverse proposals, and a fourth "blended" alternative.

Our review of the Pipestone National Monument Draft General Management Plan proposal as presented in this DEIS raises several concerns. The following is a brief discussion of those concerns.

1) The Indian School Superintendent's House and its immediate one-acre lot is presently owned by an Indian representative group, Keepers of the Fire. Although they have genuine concern for this site, they have no authority or mechanisms for raising financial support sufficient to maintain this registered National Historic Structure. The surrounding property (school house land) used to be part of this school grounds, and is elevated, affording vistas of the PNM. It is presently owned by the Minnesota West Community and Technical College. This college has developed a modest active campus just north of this site. College or other development of the school house land, surrounding the Indian School House, is a real possibility. Such development would adversely impact the PNM and preclude future incorporation into the functions of the PNM, yet purchase of this property was not discussed in the DEIS. Only a 15.3 acre parcel further south of this parcel is considered. We suggest a supplemental DEIS or the final EIS consider an alternative that would include obtaining this school house land as well as the 15.3 acre parcel, both to provide buffering protection for the PNM's globally significant environment nearby and for optimizing PNM functions as suggested below in item 2.

2) A significant difference between the alternatives considered involves demolition or retaining in place the Reservation Avenue Entrance Drive, parking lot(s) and the existing "historic" visitor's center. This latter facility is described in the DEIS as multiply modified within the past fifty years, functionally inadequate to the point of needing considerable upgrading /modification as proposed, and requiring construction of a berm within the floodplain for protection from annual and flash flooding. Two additional houses described as historically significant are located near the entrance of the PNM, just off Reservation Avenue. These are located within a significant wetlands area of the PNM where the fringed prairie orchid, an endangered species, is currently reestablishing a presence.

The DEIS presents (beginning on page 24) "...the conditions prescribed by laws, regulations, and policies most pertinent to the planning and management of the national monument...". These citations highlight avoiding further harm, promoting protection of and whenever possible restoration of previously impacted/degraded prairie, wetland, floodplain and significant species within the PNM. Did the Park Service consider the option of moving and restoring the visitor center and entrance houses at another location, rather than demolishing them? This, similar to alternative 1, would allow restoring an uninterrupted prairie at the center of the PNM and at the present entrance area. One possible relocation site for moving these structures is to a setting on the school house land mentioned in 1) above. This could improve prairie vistas and perhaps orientation for visitors, consolidate a visitor's introduction to the historic and cultural resources of the PNM, improve user fee operations, and provide a reasonable site to relocate/consolidate maintenance functions as well.

Alternatives 2 and 3 discuss anticipated impacts from remodeling the visitor's center and entrance houses in place. The DEIS presentation of alternatives 2 and 3 does not include meaningful consideration of the continued, cumulative and intentional maintenance of invasive

species with fertilizers, weed controls and such around the buildings and parking lots. The fact that the entrance road and abandoned railway are known significant routes of invasive species impacting the prairies is not addressed. The DEIS indicates that alternative 1 would remove a variety of visitor and support functions off-site, but does not discuss possible locations nor the impacts associated with moving these functions off-site. Please include such information in the final EIS.

Wherever these functions are ultimately located, the final EIS should consider modifying the structures to incorporate "green architecture." The Park Service could commit to retaining the historical nature of these buildings while using energy efficient and ecological design features, such as efficient heating, cooling, insulation, lighting, vegetated swales, and permeable pavements, by incorporating their use in this ideal setting.

3) Maintenance is currently conducted from several buildings, including the visitor's center, an entrance road house, and a structure adjacent to Pipestone Creek off Hiawatha Avenue and overlooking the Sioux Quartzite Escarpment. All three of these sites threaten important PNM ecological holdings, are responsible for some degree of run-off and spill impacts and complicate best management practices. Alternative 1 proposes moving the present structure on the escarpment "off-site" and replacing it with a parking-trailhead area with restrooms. While some impacts of this revised use are briefly presented, the questions of how the restrooms will avoid contributing to the creek impairment, how parking lot spills and run-off will be mitigated, and what impacts the relocated maintenance structure will have are not adequately addressed.

4) The DEIS mentions a growing concern for developments of neighboring properties surrounding the PNM. While the possibility of selectively expanding PNM to obtain a "buffer" zone is presented with respect to a portion of bordering lands to the north and a small northeast area, impacts to the west, south and east sides are only acknowledged. Given the importance and uniqueness of the PNM to the local economy, the state and national preservation inventory, and its sacredness to multiple tribal groups, we recommend a supplemental DEIS or the final EIS present specific ways of addressing neighboring developments with city and state planning groups. The possibility of PNM expansion to create buffer zones, easement purchases or agreements, or participation in local planning programs to better represent the PNM concerns are some opportunities that should be more completely presented. Although protecting vistas is a problematic effort, zoning which designates preservation of prime farmland with limitations to tower and bulk structures may be possibilities for at least the western and northern views into and across this prairie setting.

5) Mr. Thomas Bramscher of our Water Division is investigating the status of the impaired Pipestone Creek, its restoration process, and development of a Total Maximum Daily Load (TMDL). These considerations might be expedited in light of this creek's impacts upon the PNM.

6) The DEIS makes several references to bringing trails up to park service standards. A supplemental draft or final EIS should discuss what those standards are and what impacts such enhancement could have. We recommend that they could include the use of permeable surfaces

to minimize run-off, bioswale adaptations to the adjacent lands, and reasonable adoption of handicap accessibility considerations.

7) Appendix E (page 255) mentions the abandoned Soo Line Railway right-of-way that traverses the PNM south to north along the east edge of the Sioux Escarpment. Because this is another major pathway for invasive species and directly challenges the historic and environmentally significant Nicollet biological site, a supplemental DEIS or final EIS should address its impacts and possible mitigation.

8) The PNM is a sacred site for tribal cultures who find great significance in and seek the solace of silence. Park user experience is typically a concern of the NPS. Since one aspect of prairie is its soft sounds, the supplemental DEIS or final EIS should address noise as an issue. The sounds from traffic, the use of loud pumps to drain quarry pits, ongoing maintenance methods, and now the possibility of nearby wind energy turbines are among the conditions that should be discussed in this plan.

We commend the Park Service for your extensive efforts to reach out to tribal stakeholders. We also commend your efforts to negotiate with adjacent land managers to address invasive species encroaching along the northern edge of the PNM. Community outreach is clearly a significant factor in the survival of the PNM setting; we encourage your continued efforts there.

Our review of this DEIS has identified concerns in several critical areas. Based upon these human and natural environmental concerns and the information we request to be provided in a supplemental DEIS or the final EIS, we have assigned a rating of "EC-2" (environmental concerns, insufficient information). Please refer to the enclosed Summary of Rating Definitions Sheet. This rating will be published in the Federal Register.

We appreciate the opportunity to review and comment on this DEIS for the Pipestone Draft General Management Plan. We would welcome questions or greater participation in considering alternatives suggested in our comments. Please feel free to contact me or Norm West of my staff at 312-353-5692 or west.norman@epa.gov. Specific questions concerning the water issues should be addressed to Tom Bramscher at 312-886-6753, or bramscher.thomas@epa.gov.

Sincerely,

/ S /

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems and Communities